

REMARKS/ARGUMENTS

Favorable reconsideration of this application is respectfully requested.

Claims 33-64 are pending in this application. Claims 33-34, 41-42, 48-49, 55, and 60 were rejected under 35 U.S.C. § 102(e) as anticipated by U.S. patent application publication 2001/0014836 A1 to Tamaki et al. (herein “Tamaki”). Claims 35-40, 43-47, 50-54, 56-59, and 61-64 were rejected under 35 U.S.C. § 103(a) as unpatentable over Tamaki in view of U.S. patent 5,539,652 to Tegethoff.

Addressing the above-noted rejections, those rejections are traversed by the present response.

The claims as currently written are believed to clearly distinguish over the applied art.

As recited in independent claim 33, a system for creating and/or editing a structured parts list includes a structured parts list information storage configured to store structured parts list information on components including a plurality of parts, and to output the structured parts list information based on input retrieval information. That subject matter is fully supported by the original specification for example in the Resource DB 1 shown in Figure 1 and in steps S1 and S2 in Figure 4. According to features noted above, input retrieval information results in the output of structured parts list information. Further, as recited in independent claim 33, a parts information storage stores parts information on a plurality of parts and outputs parts information corresponding to parts listed in the output structured parts list information. That feature is fully supported for example by the Approved Parts DB 2 in Figure 1 and in step S3 in figure 4.

As further recited in independent claim 33, a parts information list creating and/or editing device retrieves the structured parts list information stored in the structured parts list information storage based on the input retrieval information, retrieves the parts information on respective parts listed in the retrieved structured parts list information, and creates a parts

information list using the correspond parts information output from the parts information storage. That subject matter is fully supported for example by the Resource Parts List Creating/Editing Unit 3 in Figure 1 and in step S4 in Figure 4.

Further, a structured parts information list creating and/or editing device creates updated structured parts list information based on the parts information list created by the parts information creating/editing device, and stores the updated structured parts list information in a memory for subsequent access. That subject matter is fully supported for example in the Resource Parts List Creating/Editing Unit 3 and storage unit 6 in Figure 1 and in steps S5-S7 in Figure 4 of the present specification.

Applicants respectfully submit the teachings in Tamaki do not fully meet the limitations in claims 33-64.

Initially, applicants note the basis for the outstanding rejection has not set forth what elements in Tamaki are being cited with respect to the claimed features. The statements for the rejection broadly reference Tamaki at paragraphs [0117]-[0122] and at columns (presumably pages) 16-18. However, the Office Action has not provided any specific elements in Tamaki that are cited to correspond to the claimed features. The above-noted description of the claims clearly sets forth specific elements and operations in Figures 2-4 corresponding to the claimed features. However, the basis for the outstanding rejection has not at all indicated how Tamaki is being read on the claimed features.

Tamaki is directed to a production system that can access a parts list storage section 2 for storing parts list information and a parts stock storage section 4 for indicating a stock of parts. Tamaki goes on to note the use of a data storage unit 10, a superfluous parts adjusting unit 112, and a deficient parts adjusting unit 111. However, such teachings in Tamaki merely disclose an operation that can ensure that desired parts are in stock. As noted above, Tamaki discloses several elements for example in Figure 1, but applicants have no indication at all

how such elements are being corresponded to the claimed features as the outstanding rejection has not felt obligated to provide any proper explanation of the rejection.

Tamaki is not at all directed to a system for creating and/or editing structured parts list information. Instead Tamaki is directed to a manufacturing system that can ensure that a list of required parts is adequately stocked, and determine whether any parts are deficient or superfluous. Such a structure in Tamaki differs from the claims as currently written.

First, Tamaki does not disclose any “structured parts list information storage configured to store a structured parts list information on components, the listed components including a plurality of parts, and to output the structured parts list information based on input retrieval information”, as recited in the claims.

According to such a claimed feature, a listing of components is provided and based on an input retrieval information, for example selecting one of the components, parts lists information (e.g. the parts making up the component) are provided. Tamaki does not disclose or suggest such a feature and the outstanding Office Action has not indicated element in Tamaki corresponding to such a feature.

Tamaki does disclose a parts list storage section 2, but Tamaki does not disclose or suggest that that element 2 stores information of different components including parts, rather than just individual parts. Again the outstanding Office Action has not even attempted to address this claimed feature.

Further, Tamaki does not disclose to “output the parts information corresponding to ***parts listed in*** the structured parts list information output from the structured parts list information storage” (emphasis added).

As noted above Tamaki does disclose a parts list storage section 2. However, that parts list storage section 2 merely provides an output of parts, but does not provide parts that are “listed in the structured parts list information output from the structured parts list

information storage". As noted above the claims require both a "structured parts list information storage configured to store structured parts list information on components" and additionally a "parts information storage configured to store parts information on a plurality of parts". Clearly the parts list storage section 2 in Tamaki does not correspond to both such elements.

Tamaki also does disclose a parts-in stock storage section 4 that is merely a listing of parts in storage and has no relation to either of the above-noted claim features.

Tamaki also clearly fails to teach or suggest the "parts information list creating and/or editing device" as recited in the claims. For example as recited in independent claim 33 the claimed system includes:

a parts information list creating and/or editing device configured to retrieve the structured parts list information stored in the structured parts list information storage based on the input retrieval information, to retrieve the parts information on respective parts listed in the retrieved structured parts list information, and to create a parts information list[.]

The other independent claims recite similar features.

According to the features noted above, a parts information list is created and/or edited based on two different pieces of information. The first piece of information is structured parts list information that is retrieved based on input retrieval information. As a non-limiting example provided for example in the present specification, a structured parts information list can store information directed to previously designed electronic circuit boards and known electronic circuit boards.¹ The second piece of information utilized is parts information on respective parts listed in the retrieved structured parts list information. For example such information can include information of parts such as a parts identification, function, name and manufacture, shape, prospect, price, and/or approval data, in addition to including

¹ See for example the present specification at page 11, line 25 to page 12, line 6.

information of other components having functions comparable with one presently retrieved.²

Based on those two pieces of information a parts information list is created. Such features are clearly not met by Tamaki.

As noted above, in the claimed features a structured parts list information storage stores information directed to *components including a plurality of parts*. As an example noted above information directed to previously designed electronic circuit boards and known electronic circuit boards can be stored. The information of those components of circuit boards include a list of the parts therein. Then, in the claimed invention parts information corresponding to the parts *listed in the structured parts list information* is output. As noted above the structured parts list information can store information of a component such as an electronic circuit board; thus, in the claimed invention parts information for the parts that form that electronic circuit board component are then output, by the claimed “parts information storage”. Tamaki does not disclose any similar feature.

First, in Tamaki the parts list storage section 2 is merely a parts list storage section and does not store information of *components including a plurality of parts*. Further, the parts stock storage section 4 in Tamaki merely indicates a stock of parts. In Tamaki if a part is not stocked, no information of that part would appear to be provided. Thus, Tamaki clearly does not output *parts information corresponding to the parts listed in the structured parts list information*, as also required in the claims.

Moreover, even if such elements in Tamaki correspond to the claimed features, which applicants dispute, Tamaki does not disclose or suggest creating an additional parts information list based on information in the parts list storage section 2 and information the parts stock storage section 4.

² See for example the present specification at page 13, lines 1-11.

One reference to the above-noted teaching of creating a parts list information based on the two pieces of information noted above appears to be an indication in the Office Action stating that in Tamaki “The updated structural parts list is provided to the production planning system where it is stored in a data storage unit. See page 18, second column”.³

That statement in the outstanding Office Action is not at all understood as first Tamaki does not appear to disclose that any “updated structural parts list” is created based on retrieving (1) “the structured parts list information stored in the structured parts list information storage based on the input retrieval information”, and retrieving (2) “the parts information on respective parts corresponding to the retrieved structured parts list information”.

Further, the noted page 18, second column of Tamaki is merely claims 1-4 of the publication that only provide broad indications of making adjustments to eliminate superfluous parts and changing a production plan based on recognized deficient parts. However, such teachings do not correspond to the claimed features noted above.

Moreover, applicants respectfully submit Tamaki fails to teach or suggest “creating an updated structured parts list information based on the parts information list created by the parts information list creating and/or editing device, and to store the updated structured parts list information in a memory for subsequent access”, as specifically required in independent claim 33, and as similarly required in other claims.

With respect to that feature the outstanding Office Action again cites Tamaki with respect to disclosing an adjusting means in which superfluous or deficient parts are identified. However, such teachings in Tamaki are not directed to the claimed features.

As noted above, in the claims an updated structural parts list information is stored in a memory. The Office Action at one point appears to indicate that such a claimed feature

³ Office Action of February 17, 2006, page 4, lines 3-5.

corresponds to the parts list stored in the parts list storage section 2 in Tamaki. However, as is clear from the disclosure in Tamaki no operation of the deficient parts adjusting unit 111 and superfluous parts adjusting unit 112 result in changing the data stored in the parts list storage section 2.

That is, in the claims the structured parts information list creating and/or editing device stores updated structured parts list information. For Tamaki to meet such a claim limitation in the way that Tamaki is cited against the claims, Tamaki would have to operate so that the deficient parts adjusting unit 111 and superfluous parts adjusting unit 112 operate to change the information stored in the parts list storage section 2. Tamaki does not disclosure or suggest such a structure, nor has the Office Action pointed to any disclosure in Tamaki that provides such a teaching.

In maintaining the outstanding rejection the outstanding Office Action states:

Tamaki discloses parts list information providing a list of required parts for a product. See abstract and page 6, paragraphs [0117]-[0118]. Tamaki discloses an adjusting means in which superfluous or deficient parts are identified from the part stock information and parts information and the production planning system including the original parts list is modified accordingly. If there are deficient parts or superfluous parts, the parts list information is adjusted to eliminate the deficient parts as well as superfluous parts. The list of required parts are parts of product in the production planning system (i.e., component). Thus, the listed products (i.e., components) in the production planning system include a plurality of parts.⁴

In response to the first basis for maintaining the outstanding rejection, applicants reviewed the Abstract of Tamaki and the disclosure at page 6, paragraphs [0117]-[0118]. At no portion therein does Tamaki disclose or suggest elements corresponding to both of the “structured parts list information storage” and “parts information storage”. Applicants again note the Office Action has not indicated which elements in Tamaki are actually being cited

⁴ Office Action of February 17, 2006, top of page 7.

with respect to such features. Applicants submit that is the case because any attempt to make a proper and concrete rejection based on Tamaki would be recognized as improper; the Office Action appears to not even attempt to make a proper rejection by identifying the elements in Tamaki corresponding to the claimed features.

The above-noted statement for maintaining the outstanding rejection is also not at all understood. Tamaki does not disclose adjusting the parts list information stored in a memory to eliminate the deficient or superfluous parts. Tamaki at most appears to disclose *adjusting the production process* in view of a recognition of superfluous or deficient parts. That also appears clear for example from the Abstract of Tamaki. However, Tamaki does not disclose or suggest that the information stored for example in the parts list storage section 2 is updated based on the recognition or deficient or superfluous parts. Applicants request that it be clearly indicated on the record where, what pages and line, Tamaki provides such a teaching. This request was previously made and still has not been addressed.

Applicants also note that at this time no specific indication has ever been provided where Tamaki discloses information in the parts list storage section 2 is changed based on the recognition of superfluous or deficient parts. Applicants believe that has not been provided because Tamaki does not give such a teaching, and because the outstanding rejection is not properly considering the actual claimed features.

In such ways, the reliance in the Office Action on the teachings of adjusting for superfluous or deficient parts in Tamaki misconstrues those teachings in Tamaki relative to the claimed features. The claims clearly recite updating the structured parts list information, which is not performed by adjusting for superfluous or deficient parts in Tamaki.

In such ways, each of the independent claims, and the claims dependent therefrom, are believed to distinguish over Tamaki.

Applicants also again note each instance of referencing the teachings in Tamaki broadly refers to pages of Tamaki without providing any specific indication as to what actual teaching in Tamaki is being cited with respect to the claimed features. Applicants also note several reliances on the teachings of Tamaki refer to the second column of page 18, which is claims 1-4 of Tamaki. It is unclear how the Office Action is trying to rely upon broad claims in a patent application publication to meet the claimed features. Those broad claims in the publication do not even appear to disclose any of the features relied upon in the Office Action. Applicants respectfully again request that it be clearly indicated on the record which elements in Tamaki are being corresponded to the claimed features. The arguments discussed above provide a detailed explanation as to how the claims clearly differ from the teachings in Tamaki, and no disclosure in claims 1-4 of the publication of Tamaki is believed to contradict the actual disclosure in Tamaki, which clearly does not meet the claim limitations. That also appears evident as again the outstanding Office Action has not actually cited any elements in Tamaki as corresponding to the claimed features, but attempts to only cite broad disclosures in claims 1-4 in Tamaki with respect to the claimed features.

Moreover, applicants respectfully submit the outstanding rejection still has not properly considered features in the dependent claims, such as dependent claims 34, 42, and 49, setting forth specifics of the parts information including at least one of “an identification, a function, a manufacture, a feature of at least one of size and shape, a future prospect, a price, and approval data related to approval and non-approval for use”. With respect to the above-noted features the outstanding Office Action states “Tamaki teaches that the parts information in storage may include information regarding a name of the part, a feature such as quantity consumed, a cost evaluation module, etc. See figures 24-27”.⁵

⁵ Office Action of February 17, 2006, page 4, first full paragraph.

That basis for the outstanding rejection is not understood as first any disclosure in Tamaki of storing information of a name of a part, a feature such as quantity consumed, a cost evaluation module, etc. does not correspond to the claimed features. The claims do not recite any of a name, feature such as quantity consumed, and cost evaluation module. The outstanding rejection is simply not properly reading the claimed features set forth in claims 34, 42, and 49.

The above discussed differences between the claimed invention and the teachings in Tamaki result because Tamaki is directed to a different device than in the claimed invention. Tamaki is directed to a manufacturing system that ensures that parts are adequately stocked. Tamaki does not disclose or suggest management that can determine whether a part can be used in view of its specification, price, form, and discontinuation.

In such ways, the above-noted claims as currently written even further clearly distinguish over Tamaki.

Further, with respect to the further rejection based on Tamaki in view of Tegethoff, that rejection is traversed by the present response.

Tegethoff is directed to a method for manufacturing test simulation in electronic circuit design and relates to a tradeoff between productivity and design property.

The device disclosed by Tegethoff has no relation whatsoever to the device of Tamaki. Tamaki as noted above is directed to a system to ensure that parts are adequately stocked. Tegethoff is not directed to any type of such system and thus has no relevance whatsoever to the teachings in Tamaki.

The motivation set forth in the Office Action to combine the teachings in Tegethoff relative to those of Tamaki is also improper. More specifically, the Office Action states the teachings of prediction concerning operation, simulation, etc. in Tegethoff could be applied to the teachings in Tamaki "because early prediction of manufacturing behavior drives design

changes which optimize the product's manufacturability and testability, thus improving product quality and reducing cost and utilizing a parts list would help facilitate this prediction. See column 6 of Tegethoff".⁶

The above-noted basis for the outstanding rejection is believed to be clearly improper as Tamaki is not directed to a device that would have any benefit from "driving design changes". Tamaki is clearly directed to a device utilized well after any type of design is implemented as Tamaki is directed to a device to ensure that parts are adequately stocked; which clearly takes place well after any design is implemented. The test simulation in electronic circuit design in Tegethoff has no relevance whatsoever to such a system as in Tamaki. Further, what the basis for the outstanding rejection has not even considered or addressed is why the noted teachings in Tegethoff would be relative to Tamaki as Tamaki is not directed to any "prediction concerning operation, simulation, etc.".

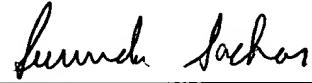
In such ways, applicants respectfully submit the further combination of teachings of Tamaki in view of Tegethoff is traversed by the present response.

⁶ Office Action of February 17, 2006, top of page 6.

As no other issues are pending in this application, it is respectfully submitted that the present application is now in condition for allowance, and it is hereby respectfully requested that this case be passed to issue.

Respectfully submitted,

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